APPENDIX 4-3

PEAT AND SPOIL MANAGEMENT PLAN

FEHILY TIMONEY

DESIGNING AND DELIVERING
A SUSTAINABLE FUTURE

CUNLAGHFADDA GREEN ENERGY PROJECT

PEAT & SPOIL MANAGEMENT PLAN

Prepared for: **MKO Ltd**

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PEAT AND SPOIL MANAGEMENT PLAN
CUNLAGHFADDA GREEN ENERGY PROJECT

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Abstract: Fehily Timoney and Company (FT) were engaged by McCarthy Keville O'Sullivan (MKO) to compile a Peat and Spoil Management Plan (PSMP) for the Cunlaghfadda Green Energy Project. The purpose of this report is to provide a Peat and Spoil Management Plan for the construction phase of the Proposed Project. The report describes how peat and spoil which will be excavated from infrastructure locations such as turbine bases and tracks and will be handled and placed/reinstated onsite. The report also provides construction details for the types of tracks which will be put in place at the Site and proposed peat and spoil placement/reinstatement areas which will be developed at the Site.

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1. INTRODUCTION

1.1 Fehily Timoney and Company

Fehily Timoney and Company (FT) is an Irish engineering, environmental science and planning consultancy with offices in Cork, Dublin and Carlow. The practice was established in 1990 and currently has c.100 members of staff, including engineers, scientists, planners and technical support staff. We deliver projects in Ireland and internationally in our core competency areas of Waste Management, Environment and Energy, Civils Infrastructure, Planning and GIS and Data Management.

This Report was written by Ian Higgins (FT Technical Director, PGeo, MSc in Geotechnical Engineering) and Alan Whelan (FT Project Engineer, BEng (Hons) Civil Engineering). Ian is a Technical Director with Fehily Timoney and has over 25 years' experience in geotechnical engineering. Alan is a Senior Project Engineer with Fehily Timoney and has 5 years' experience in geotechnical engineering.

1.2 Project Description

Fehily Timoney and Company (FT) was engaged in December 2023 by McCarthy Keville O'Sullivan (MKO) to compile a Peat and Spoil Management Plan for the proposed Cunlaghfadda Green Energy Project (the 'Proposed Project').

The Proposed Project is located approximately 5.3km north-west of Claremorris, 17.8km south-east of Castlebar in Co. Mayo.

The Proposed Project site comprises an area of approximately 1.65km^2. The surrounding landscape is predominately flat with land-use comprising forestry, agricultural land, and cutaway peatland.

1.3 Purpose

The purpose of this report is to provide a peat and spoil management plan with particular reference to peat stability for the construction phase of the project. The report describes how peat and spoil which will be excavated from infrastructure locations such as turbine bases and tracks will be handled and managed onsite. The report also provides construction details for the types of tracks which will be put in place at the Site and proposed peat and spoil management areas which will be developed at the Site.

This peat and spoil management plan also includes a monitoring programme which will be implemented during the construction phase of the Proposed Project and a contingency plan should peat instability/failure occur at the Site.

As for all construction projects, a detailed engineering construction design must be carried out by the appointed construction stage designer prior to any construction work commencing on a particular site. This must take account of the consented project details and any conditions imposed by that consent. This must include a detailed peat stability assessment to account for any changes in the environment which may have occurred in the time leading up to the commencement of construction and a peat and spoil management plan to allow for the most appropriate geotechnical and environmental led solutions to be developed for the management of peat and spoil.

As work is carried out on the Site the contents of the peat and spoil management plan and peat stability monitoring programme will be implemented in full and updated (if required) in the Construction & Environmental Management Plan (CEMP) for the construction phase.

This peat and spoil management plan contains some drainage guidelines for construction works and for management of peat on the Site. It should be noted that the control of water quality and drainage measures for the Site is outlined in detail in Chapter 4 and 9 of the Environmental Impact Assessment Report (EIAR).

1.4 Peat Instability Definition

Peat instability in this report is defined as a mass movement of a body of peat that would have a significant adverse impact on the surrounding environment. Peat instability excludes localised movement of peat that would occur below a floating access track, creep movement or localised erosion type events.

Adherence to the peat and spoil management plan should reasonably minimise the potential for all such peat movements. However, it is noted that due to the soft ground nature of the peat terrain it is not possible to completely avoid such localised peat movement as described above. A peat stability assessment (FT, 2026) has been carried out for the Proposed Project which indicates that the Site has a low risk of large-scale peat instability.

1.5 Relevant Guidance

The relevant guidance used and referred to throughout this report includes.

- Constructed Tracks in the Scottish Uplands. Scottish Natural Heritage (2015);
- Dealing with bearing capacity problems on low volume roads constructed on peat. Roadex II Northern Periphery. Munro, R, (2004);
- Floating Roads on Peat, Scottish Natural Heritage/Forestry Commission Scotland (2010);
- Good Practice during Windfarm Construction (NatureScot, 2024);
- Guidance on Developments on Peatland: Peatland Surveys (Scottish Government, Scottish Natural Heritage, SEPA, 2017).

2. CONSTRUCTION ACTIVITIES COVERED BY PEAT AND SPOIL MANAGEMENT PLAN

2.1 Construction Activities

For the construction phase of the Proposed Project the activities that will generate peat and spoil are as follows:

(1) Upgrade of existing access tracks (as excavate and replace tracks)
(2) Construction of new excavated tracks through peat
(3) Excavation and placement of arisings
(4) Excavations in peat and overburden for a borrow pit
(5) Excavations in peat for turbine bases, hardstands and other infrastructure foundations
(6) Excavations for underground cables

Peat and spoil management of the above construction activities are covered individually in this report.

2.2 Track Construction Types

To provide access within the Site and to connect the wind turbines and associated infrastructure existing tracks will need to be upgraded and new access tracks will need to be constructed. The track construction preliminary design has taken into account the following key factors:

(1) Buildability considerations
(2) Maximising use of existing infrastructure
(3) Minimising excavation arisings
(4) Peat stability
(5) Serviceability requirements for construction and wind turbine delivery and maintenance vehicles
(6) Requirement to minimise disruption to peat hydrology

Whilst the above key factors are used to determine the track design the actual construction technique employed for a particular length of track will be determined by the prevailing ground conditions encountered along that length of track.

The general track construction techniques to be considered are given in Table 2-1. The methodologies described in Sections 3 to 5 apply to all access tracks (including temporary tracks) and upgrades to the public road.

This report describes the most suitable type of construction for each section of access track based on the ground/site conditions recorded during the site walkovers. It should be noted that this report does not include a detailed design for the access tracks on the Proposed Project. This report includes the most suitable type of track construction envisaged for each section of access track based on the ground/site conditions recorded during the site walkovers and intrusive site investigation works. Where floating tracks are proposed in this report, a proposed methodology is presented, however a detailed design will be carried out prior to construction commencing on the Site. These measures are based on available guidance, including 'Constructed Tracks in the Scottish Uplands (Scottish Natural Heritage, 2nd Edition ,2015), Floating Roads on Peat (Scottish

Natural Heritage/Forestry Commission Scotland, 2010) and 'Dealing with Bearing Capacity Problems on Low Volume Roads Constructed on Peat (ROADEX II, 2004).

Table 2.1: General Access Track Construction Techniques

Construction Method	Typical Site Conditions			Comment
	Construction Type	Typical Peat Depth (m)	Typical Slope Inclination (degs)	
Upgrade of existing access tracks	Type A and B	<2.0	Varies	Upgrade existing excavated/ floated access tracks to the required width and finished with a layer of selected granular fill – Drawing P23-270-0600-0006 and 0007
Construction of new excavated tracks through peat	Type C	Typically, less than 1.5m	Varies	New access track construction technique envisaged for various locations on the Site – Drawing P23-270-0600-0008
Construction of new floating tracks over peat	Type D	>1.0	<5	New access track construction technique envisaged for various locations on the Site – Drawing P23-270-0600-0009

Further details on access track construction types A to D are given in Sections 3 to 5 of the report.

3. UPGRADE OF EXISTING ACCESS TRACKS – TYPE A AND B

Up to 1.8km of existing access tracks and public road requiring upgrade are present across the Site and have been in operation for a significant number of years. The existing access tracks appear to have been constructed using a combination of founded and floating construction techniques. The proposed locations for upgrade of the existing access tracks on the Site are shown in Drawing P23-270-0600-0005 and details are shown in Drawing P23-270-0600-0006 and 0007. The methodology described below apply to all access tracks (including temporary tracks) and upgrades to the public road.

3.1 Upgrading Existing Access Tracks Construction Methodology

This methodology includes procedures that will be included in the construction to minimise any adverse impact on peat stability. The methodology is not intended to cover all aspects of construction such as drainage and environmental considerations, which are discussed separately in Chapter 4 and 9 of the EIAR.

(1) Access track construction will be to the line and level requirements as per design/planning conditions.

(2) For upgrading of all existing excavated access tracks (Type A – Drawing P23-270-0600-0006) the following guidelines apply:

  (a) Excavation of the access track will take place to a competent stratum beneath the peat, removing all peat and soft clay and backfilled with suitable granular fill.

  (b) Benching of the excavation will be required between the existing section of access track and the widened section of access track where the depth of excavation exceeds 500mm.

  (c) For a founded access track, the surface of the existing access track will be overlaid with up to 300mm of selected granular fill.

  (d) Access tracks will be finished with a layer of capping across the full width of the track.

  (e) A layer of geogrid/geotextile may be required at the surface of the existing access track where the existing tracks shows signs of rutting, etc.

  (f) For excavations in peat, side slopes will be not greater than 1 (v): 3 (h). This slope inclination will be reviewed during construction, as appropriate. Where areas of weaker peat are encountered then slacker slopes will be required to ensure stability.

(3) For upgrading of existing access tracks constructed using a floated construction technique (Type B – Drawing P23-270-0600-0007) the following guidelines apply:

  (a) The surface of the existing access track should be graded/tidied up prior to the placement of the geogrid/geotextile, where necessary (to prevent damaging the geogrid/geotextile).

  (b) Where granular fill has been used in the existing access track make-up, a layer of geogrid should be placed on top of the existing access track.

  (c) The geogrid may be overlaid with up to 500mm of selected granular fill.

  (d) Additional geogrid and granular fill may be required in certain sections of the works, such as where excessive rutting is noted in the existing track (to be confirmed by the designer).

(4) The finished track width will have a running width of 5m, with wider sections on bends and corners.

(5) On side long sloping ground any widening works required will be done on the upslope side of the existing access track, where possible.

(6) At transitions between new floating and existing excavated tracks a length of about 10m will have all peat excavated and replaced with suitable fill. The surface of this fill will be graded to accommodate wind turbine construction and delivery traffic.

(7) A final surface layer will be placed over the existing access track, as per design requirements, to provide a track profile and graded to accommodate wind turbine construction and delivery traffic.

4. CONSTRUCTION OF NEW EXCAVATED TRACKS THROUGH PEAT – TYPE C

The excavation of peat and spoil and founding of access tracks on competent stratum (below the peat) for new access tracks will be carried out at various locations on the Site (2.5km in total). The proposed locations for new excavated access tracks on the Site are shown in Drawing P23-270-0600-005 and details are shown in Drawing P23-270-0600-008.

Excavate and replace type access tracks are the conventional method for construction on peatland sites and the preferred construction technique for this Site provided sufficient placement/reinstatement capacity is available on Site for the excavated peat. This construction method will also be used to replace existing floating tracks within the Site. The methodology described below apply to all access tracks (including temporary tracks) and upgrades to the public road.

4.1 New Excavated Track Construction Methodology

This methodology includes procedures that will be adopted in the construction to minimise any adverse impact on peat stability. The methodology is not intended to cover all aspects of construction such as drainage and environmental considerations, which are discussed in Chapter 4 and 9 of the EIAR.

(1) Prior to commencing the construction of the excavated tracks, movement monitoring posts will be installed in areas where the peat depth is greater than 2.0m, and in areas identified within the peat stability risk assessment (see Geotechnical & Peat Stability Assessment, FT, 2026) as requiring monitoring.

(2) Interceptor drains will be installed upslope of the access track alignment to divert any surface water away from the construction area.

(3) Excavation of tracks will be to the line and level given in the design requirements. Excavation will take place to a competent stratum beneath the peat.

(4) Track construction will be carried out in sections of approximately 20m lengths i.e. no more than 20m of access track will be excavated without replacement with stone fill. This length will be reduced to 5m in areas identified within the peat stability risk assessments.

(5) Excavation of materials with respect to control of peat stability:

  (a) Acrotelm (to about 0.3 to 0.4m of peat) will be required for landscaping and will be stripped and temporarily stockpiled for re-use as required. Acrotelm stripping will be undertaken prior to main excavations.

  (b) Where possible, the acrotelm will be placed with the vegetation part of the sod facing the right way up to encourage growth of plants and vegetation.

  (c) All catotelm peat (peat below about 0.3 to 0.4m depth) will be transported immediately on excavation to the designated peat and spoil management areas or within the borrow pit.

(6) Once excavated, non-catotelm peat will be temporarily stored in localised areas adjacent to excavations for tracks and hardstands before being placed into the permanent peat and spoil management areas or within the borrow pit. All peat and spoil management areas will be upslope of founded tracks/hardstands and will be inspected by the Project Geotechnical Engineer before material is stored in the area. No material is to be sidecast or stored on the in-situ peat on the downslope side of the access tracks.

(7) Excavation side slopes in peat will be not greater than 1 (v): 3 (h). This slope inclination will be reviewed during construction, as appropriate. Should areas of weaker peat be encountered then slacker slopes will be required. Battering of the side slopes of the excavations will be carried out as the excavation progresses.

(8) End-tipping of stone onto the track during the construction/upgrading of the access track will be carefully monitored to ensure that excessive impact loading, which may adversely affect the adjacent peat, is limited.

(9) The excavated access track will be constructed with a minimum of 500mm of selected granular fill. Granular fill to be placed and compacted in layers in accordance with the TII Specification for Road Works.

(10) Access tracks will be finished with a layer of capping across the full width of the track.

(11) A layer of geogrid/geotextile may be required at the surface of the competent stratum.

(12) Where slopes of greater than 5 degrees are encountered along with relatively deep peat (i.e. greater than 2m) and where it is proposed to construct the access track perpendicular to the slope contours it is best practice to start construction at the bottom of the slope and work towards the top, where possible. This method avoids any unnecessary loading to the adjacent peat and greatly reduces any risk of peat instability.

(13) Where the above is not possible, a specific Risk Assessment Method Statement (RAMS) from the contractor will be produced, detailing how the downslope works will be undertaken, including that all plant would operate from the already constructed section of track, with no loading of the peat on the downslope slope and limiting the length of ground to be stripped/excavated at any one time. Movement monitoring posts (as described in the Peat & Spoil Management Plan, Section 10.1) will also be installed downslope of the works area to allow for ongoing monitoring during the construction works.

(14) A final surface layer will be placed over the excavated track and graded to accommodate wind turbine construction and delivery traffic.

(15) The construction and upgrading of access tracks in areas of deep peat (greater than 2m) will be inspected on a routine basis (by the Site Manager/Ecological Clerk of Works/Project Geotechnical Engineer) during the works, particularly before/following trafficking by heavy vehicular loads, and following intense rainfall events.

5. CONSTRUCTION OF NEW FLOATED TRACKS OVER PEAT – TYPE D

The use of new floated access tracks will be limited on the Site to areas of flatter terrain, i.e., less than a 3-degree slope. The proposed locations for floating tracks across the Site are shown in drawing P23-270-0600-0005 (0.7km in total) and details shown in drawing P23-270-0600-0009. Floating tracks are not proposed on areas of sidelong ground. The methodology described below apply to all access tracks (including temporary tracks).

A confirmatory stability analysis will be carried out by the designer where it is proposed to install floating access tracks over the peat prior to any construction work commencing on the Site.

Floating tracks minimise impact on the peat, particularly peat hydrology. As there is no excavation required no peat arisings are generated. However, where the underlying peat has insufficient bearing capacity or due to topographic restrictions an excavate and replace type access track may be more suitable (see Section 4), although this is not anticipated at the location of the floated tracks at the Proposed Project.

5.1 Floating Track Construction Methodology

This methodology includes procedures that will be included in the construction to minimise any adverse impact on peat stability. The methodology is not intended to cover all aspects of construction such as drainage and environmental considerations, which are assessed in Chapter 4 and 9 of the EIAR.

Note: Details of geogrid arrangement will be provided by the specialist geogrid provider/designer.

(1) Prior to commencing floating track construction movement monitoring posts will be installed in areas where the peat depth is greater than 2m.

(2) Base geogrid will be laid directly onto the existing peat surface along the line of the track in accordance with geogrid provider's requirements.

(3) Construction of track will be in accordance with appropriate design from the designer.

(4) The make-up of the new floated access tracks is up to 1,000mm of selected granular fill with 2 no. layers of geogrid with possibly the inclusion of a geotextile separator (drawing P23-270-0600-0009).

(5) Granular fill will be placed and compacted in layers in accordance with the TII Specification for Road Works.

(6) Following the detailed design of the floated access tracks it may be deemed necessary to include pressure berms either side of the access track in some of the deeper peat areas. The inclusion of a 2 to 5m wide pressure berm (typically 0.5m in height) either side of the access track will reduce the likelihood of potential bearing failures beneath the access track.

(7) The finished track width will be 5m, with wider sections on bends and corners.

(8) Stone delivered to the floating track construction will be end-tipped onto the constructed floating track. Direct tipping of stone onto the peat will not be carried out.

(9) To avoid excessive impact loading on the peat due to concentrated end-tipping all stone delivered to the floating track will be tipped over at least a 10m length of constructed floating track.

(10) Where it is not possible to end-tip over a 10m length of constructed floating track then dumpers delivering stone to the floating track will carry a reduced stone load (not greater than half full) until such time as end-tipping can be carried out over a 10m length of constructed floating track.

(11) Following end-tipping a suitable bulldozer will be employed to spread and place the tipped stone over the base geogrid along the line of the track.

(12) A final surface layer will be placed over the full width of the floating track, as per design requirements, to provide a track profile and graded to accommodate wind turbine construction and delivery traffic.

6. MANAGEMENT OF PEAT AND SPOIL

6.1 Management of Arisings Methodology

This methodology includes procedures that are to be included in the construction phase to minimise any adverse impact on peat stability. The methodology is not intended to cover all aspects of construction such as drainage and environmental considerations, described in Chapter 4 and 9 of the EIAR.

(1) All excavated peat and spoil will be either temporarily stockpiled locally at turbine hardstands or transported immediately on excavation to the borrow pit (see drawing P23-270-0600-0005 for borrow pit location), or to one of the designated peat and spoil management areas alongside the access tracks or adjacent to the turbine locations.

(2) Further details on the construction and reinstatement of the borrow pit are given in Section 6.4.

(3) Further details on the placement of excavated material to designated peat placement areas close to turbines are given in Section 6.5.

(4) Some of the peat, in particular the acrotelm (upper layer of the peat), excavated during construction will be used for landscaping purposes.

6.2 Summary of Peat and Spoil Volumes on Site

A summary of the excavated peat and spoil volumes calculated for the Proposed Project are given in Table 6-1.

Table 6.1: Summary of Excavated Peat and Spoil Volumes on Site

Infrastructure Element [1]	Proposed Dimensions	Peat Volume (m^3) [2]	Spoil (non-peat) Volume (m^3) [2]	Comment
7 no. Turbines and Hardstands	25m diameter excavation footprint for turbine foundation with 75 x 35m hardstand area.	19,800	26,000	Includes both temporary and permanent hardstand areas.
Access Tracks	Assumed 5m running surface with 6m wide footprint.	8,900	4,400	Includes both temporary and permanent access tracks.
Temporary Construction Compound	Hardstanding area of 25 x 75m.	450	450	
Met Mast	Hardstanding area of 25 x 30m.	200	800	
Borrow Pit	85m x 65m	1,500	13,000	
Sub Total Proposed Wind Farm		**30,850**	**44,650**	
Temporary Construction Compound (SS)	Hardstanding area of 40 x 60m.	550	550	
Substation	Hardstanding area of 105 x 125m.	2,600	14,400	
Access Tracks	Assumed 3m running surface with 4m wide footprint.	300	300	Includes both temporary and permanent access tracks plus end mast crane platform.
Sub Total Proposed Grid Connection		**3,450**	**15,250**	
	Total =	**34,300m^3**	**59,900m^3**	**Total = 94,200m^3 (peat and spoil volume)**

Note (1) The location of the infrastructure elements on the Site are shown on Drawing P23-270-0600-0005.

Note (2) A factor of 10% (bulking factor of 10%) has been applied to the excavated peat and spoil volumes to allow for expected increase in volume upon excavation and to allow for a variation in ground conditions across the Site.

6.3 Summary of Peat and Spoil Management Areas on Site

A summary of the proposed peat and spoil management areas at the Site are given in Table 6-2.

Table 6.2: Summary of Peat and Spoil Management Areas on Site

Location (1)	Peat and Spoil Volume (m^3)	Comment
Borrow Pit	27,000	See Drawing P23-270-0600-0010 for further details
Peat and Spoil Management areas	59,400	Maximum of 1.25m in height for peat and 1.5m for spoil, where slopes are relatively shallow (<5 degrees) (locations shown on Drawing P23-270-0600-005)
Landscaping (2)	15,500	It is estimated that 2,000m^3 of peat will be required for landscaping purposes and ballast backfill at each of the 7 no. turbine locations, plus that required for the reinstatement of the temporary construction areas.
Total =	**101,500m^3**	

Note (1) The location of the proposed borrow pit at the Site is shown on Drawing P23-270-0600-0005.

Note (2) Some of the acrotelm (upper layer of the peat) excavated during construction will be used for landscaping purposes.

6.4 Summary of Stone Volume Requirements

Table 6.3 below summarises the stone volume requirement for the Proposed Project, excluding the final blinding layer which will come from an external source.

Table 6.3: Summary of Stone Volume Requirements

Infrastructure Element (1)	Typical Dimensions	Stone Volume (m^3) (2)	Comment
7 no. Turbines and Hardstands	25m diameter excavation footprint for turbine foundation with 75 x 35m finished hardstand surface.	33,000	Hardstanding area and foundation footprint. Allowance included for mini-crane pads and blade finger hardstands associated with the main hardstand, plus allowance for side slopes in areas of fill.
Access Tracks (including cabling)	Assumed 5m running surface with 6m wide development footprint.	16,500	Allowance includes for widening on bends, at junctions, laybys, and tie-ins to hardstands.
Meteorological Mast	10 x 10m foundation footprint and 25 x 30m hardstanding area.	500	-
Temporary Construction Compounds	Hardstanding area of 25 x 75m.	2,000	
Borrow Pit	85m x 65m	2,000	Borrow pit external berm
Sub Total Proposed Wind Farm		**54,000**	
Onsite 110kV Substation	Hardstanding area of 105 x 125m.	18,200	
Substation Construction Compound	Hardstanding area of 40 x 60m.	3,000	
Access Tracks	Assumed 3m running surface with 4m wide development footprint.	2,000	Includes both temporary and permanent access tracks plus end mast crane platform.
Sub Total Proposed Grid Connection		**23,200**	
	Total =	**77,200m^3**	

Notes

Note (1) A contingency factor of 10% has been applied to the volumes to allow for expected bulking upon excavation and to allow for a variation in ground conditions across the Site.

Note (2) It should be noted that the volumes given in Table 6-3 are subject to confirmatory design.

6.5 Construction and Reinstatement of Borrow Pit

One location has been identified as an on-site borrow pit (adjacent to T01) and is shown on Drawing P23-270-0600-0010. The peat depth within the footprint of the borrow pit is generally less than 1m, with a localised depth of 2.2m in the southwestern corner. The borrow pit location was selected based on the shallow depth of peat and accessibility from the existing tracks. The peat is underlain by a sand and gravel layer.

Upon removal of the sand and gravel from the borrow pit for reuse within the Proposed Project, it is proposed to reinstate the borrow pit using excavated peat and spoil. The majority of the material backfilled into the borrow pit will be non-peat spoil. The excavated granular material from the borrow pit will be used in the construction of the infrastructure elements (turbine bases, tracks, etc.) for the Proposed Project. The contractor excavating the granular material will be required to develop the borrow pit in a way which will allow the excavated peat and spoil to be placed safely. It is proposed to construct cells within the borrow pit for the placement of the excavated peat and spoil. This is to allow for the safe placement and grading of the peat and spoil using dumper trucks and excavators.

Excavation works will be undertaken and supervised by experienced contractor and suitably qualified personnel. The maximum depth of the borrow pit is 6m. The text below provides design and construction commitments for the borrow pit.

Table 6-4: Summary of Borrow Pit Volumes

Borrow Pit No.	Estimated Extraction Volume (m^3) (1)	Storage Volume(m^3)
1	16,000	27,000

Notes

Note (1) Extraction volume refers to the volume of reusable material to be extracted from the borrow pit, based on available data.

Drawing P23-270-0600-0010 show the proposed plan and cross-section of the borrow pit.

The borrow pit will be constructed as follows:

(1) It is proposed to construct the borrow pit so that the base of the borrow pit is below the level of the adjacent section of access track.

(2) Slopes within the excavated granular material formed around the perimeter of the borrow pit will be formed at stable inclinations to suit local conditions, at an angle of 45 degrees.

(3) The stability of the slopes within the borrow pit will be inspected by the Project Geotechnical Engineer upon excavation to ensure stability during construction works and in the long term. This inspection will allow unfavourable conditions to be identified and suitable mitigation measures (such as slackening of slopes) to be applied.

(4) It will be necessary to construct a buttress along part of the perimeter of the borrow pit to maximise the storage capacity The buttress should be constructed of selected granular fill and placed and compacted in suitable layers to form a buttress of sufficient stability to retain the placed peat and spoil. The founding stratum for the buttress will be inspected and approved by the Project Geotechnical Engineer.

(5) The height of the buttress constructed should be greater than the height of the reinstated peat and spoil to prevent any surface peat and spoil run-off. A buttress of up to 3m in height will be required.

(6) Infilling of the peat and spoil will commence at the back edge of the borrow pit and progress towards the borrow pit entrance/rock buttress, allowing the borrow pit to be developed and infilled in cells. The contractor excavating the rock will be required to develop the borrow pit in a way which will allow the excavated peat and spoil to be reinstated safely.

(7) In order to prevent water retention occurring behind the buttress, the buttress will be constructed of coarse boulder fill with a high permeability. The buttress will be constructed of well graded granular rock fill of about 100mm up to typically 500mm in size.

(8) The use of temporary access ramps and long reach excavators during the placement of the excavated peat and spoil will be required.

(9) The surface of the placed peat and spoil will be shaped following backfill using excavators to allow efficient run-off of surface water from the placed arisings towards the perimeter of the borrow pit.

(10) As the berms are slightly higher than the retained peat and spoil, drains will be provided at regular intervals through the berms, at the same level as the top of the peat surface, to prevent ponding of water around the edges of the repositories. These drains will be 150mm diameter flexible plastic drainage pipe or equivalent.

(11) A layer of geogrid to strengthen the surface of the placed peat and spoil within the borrow pit will be required.

(12) An interceptor drain will also be installed upslope of the borrow pit. This drain will divert any surface water away from the borrow pit and hence prevent water from ponding and lodging during construction and also when reinstated.

(13) Temporary control of groundwater within the borrow pit will be required. A temporary pump and suitable outfall locations will be required during construction.

(14) A temporary settlement pond will be constructed at the lower side/outfall location of the borrow pit.

(15) The acrotelm will be placed with the vegetation part of the sod facing the right way up to encourage growth of plants and vegetation at the surface of the peat and spoil within the borrow pit.

(16) Supervision by the Project Geotechnical Engineer will be carried out for the development of the borrow pit.

(17) All the above-mentioned requirements will be implemented by the Contractor during construction.

6.6 Designated Peat and Spoil Management Areas

The following commitments for the placement of peat and spoil alongside the access tracks and as landscaping around turbines will be implemented during construction. These areas have been selected based on the depth of peat and the slope angle.

(1) Excavated peat/spoil will be placed/spread on the upslope side of sections of access track. These locations are shown in Figure P23-270-0600-0005. Excavated spoil will only be placed in areas where there is no/limited peat (<0.3m), such as around the substation and close to T04, T06 and T07.

(2) The peat placed within the areas shown on Drawing P23-270-0600-0005 will be restricted to a maximum height of 1.25m, as shown on drawing P23-270-0600-0011. Any weak/liquified peat must be placed within the proposed borrow pit and not stored within these areas.

(3) The spoil placed in the areas shown on Drawing P23-270-0600-0005 will be restricted to a maximum height of 1.5m, as shown on drawing P23-270-0600-0012.

(4) The placement of excavated peat will be avoided without first establishing the adequacy of the ground to support the load. The placement of peat and spoil within the peat and spoil management areas will require the use of long reach excavators, low ground pressure machinery and possibly bog mats in particular for drainage works.

(5) Where there is any doubt as to the stability of the peat surface then no material will be placed on to the peat surface. The risk of peat instability is reduced by not placing any loading onto the peat surface.

(6) It should be ensured that the surface of the placed peat is shaped to allow efficient run-off of surface water. Shaping of the surface of the peat will be carried out as placement of peat within the placement area progresses. This will reduce the likelihood of debris run-off and reduce the risk of instability in the placed peat.

(7) Finished/shaped side slopes in the placed peat will be not greater than 1 (v): 4 (h). This slope inclination will be reviewed during construction, as appropriate.

(8) The acrotelm will be placed on the finished surface with the vegetation part of the sod facing the right way up to encourage growth of plants and vegetation at the surface of the placed peat within the placement areas.

(9) Movement monitoring instrumentation will be placed around the areas where peat has been placed. The locations where monitoring is required will be identified by the Project Geotechnical Engineer on Site.

(10) Supervision by the Project Geotechnical Engineer is required for the works.

(11) An interceptor drain will be installed upslope of the designated peat placement areas to divert any surface water away from these areas. This will help ensure stability of the placed peat and reduce the likelihood of debris run-off.

(12) All the above-mentioned commitments will be undertaken by the Contractor during construction.

7. EXCAVATIONS IN PEAT FOR TURBINE BASES, HARDSTANDINGS AND INFRASTRUCTURE FOUNDATIONS

The turbine bases will be founded on competent founding strata which will require excavation through peat and any soft overburden.

Similarly, crane hardstandings, construction compound, substation platforms and met mast foundations are to be founded on competent mineral soil which will also require excavation through peat and spoil. Excavations for the borrow pit will also require the removal of peat and non-peat spoil overlying the granular material.

7.1 Methodology

This methodology includes procedures that will be included in the construction to minimise any adverse impact on peat stability. The methodology is not intended to cover all aspects of construction such as drainage and environmental considerations, which are covered in Chapter 4 and 9 of the EIAR.

(1) With respect to placement of arisings from excavations the commitments given in Section 6 are to be followed.

(2) All excavations within peat will be adequately supported or peat slopes will be battered to a safe slope inclination typically of 1(v): 3(h). This slope inclination will be reviewed during construction, as appropriate. Where areas of weaker peat are encountered then slacker slopes will be required.

(3) Excavations will be kept reasonably free from water at all times. Water will be prevented from being impounded within excavations by either using drainage channels cut into the excavation face or by pumping.

(4) Where water is channelled or pumped from an excavation then this water will be fed into an established watercourse or drainage ditch following suitable treatment, as described in Chapter 4 and 9 of the EIAR.

8. EXCAVATIONS FOR UNDERGROUND CABLES

A 110kV connection between the Proposed Wind Farm and the national electricity grid will be necessary to export electricity. It is proposed that the Proposed Wind Farm will connect to the national grid via a new substation located on the north side of the Site.

The Proposed Grid Connection construction methodology is described in Appendix 4-2 of the EIAR.

It is proposed to install the underground cable at a uniform level within the footprint of the access tracks. The grid connection route will encounter peat and till derived from limestone and will be constructed on solid ground to Eirgird specifications.

8.1 Methodology

This methodology includes procedures that are to be included in the construction to minimise any adverse impact on peat stability. The methodology is not intended to cover all aspects of construction such as drainage and environmental considerations, which are described in Chapter 4 and 9 of the EIAR.

(1) With respect to placement of arisings from excavations the guidelines given in Section 6 will be followed.

(2) All excavations within peat will be adequately supported or peat slopes will be battered to a safe slope inclination typically of 1(v): 3(h). This slope inclination will be reviewed during construction, as appropriate. Where areas of weaker peat are encountered then slacker slopes will be required.

(3) Similarly, all excavations within non-peat overburden for the cable trench will be adequately supported or battered to a safe slope inclination typically of 1(v): 1.5 or 2(h). This slope inclination will be reviewed during construction, as appropriate.

(4) Excavations will be kept reasonably free from water at all times.

(5) Any material excavated from the cable trench which is deemed suitable for reinstatement of the trench will be used for this purpose i.e. stockpiled locally to the works and reused for backfilling.

9. GENERAL COMMITMENTS FOR GOOD CONSTRUCTION PRACTICE

To minimise the risk of construction activity causing potential peat instability the Construction Method Statements (CMS) for the project will also implement, but not be limited to, the general measures below together with the specific measures.

(1) Uncontrolled concentrated water discharge onto peat slopes identified as being unsuitable for such discharge will be avoided. All water discharged from excavations during work will be piped over areas specifically assessed as being unsuitable and hence directly into suitable drainage lines.

(2) All excavations will be suitably supported to prevent collapse and development of tension cracks.

(3) Avoidance of placing fill and excavations in the vicinity of steeper peat slopes, that is at the crest or toe of the slope.

(4) Installation and regular monitoring of geotechnical instrumentation during construction in areas of possible poor ground, such as deeper peat deposits (see Section 10).

(5) Site reporting procedures will be implemented to ensure that working practices are suitable for the encountered ground conditions. Ground conditions to be assessed by suitably experienced geotechnical engineer.

(6) Regular briefing of all site staff (e.g. toolbox talks) to provide feedback on construction and ground performance and to promote reporting of any observed change in ground conditions.

(7) Routine inspection of the Site by the Contractor and Project Geotechnical Engineer will be undertaken and will include an assessment of ground stability conditions (e.g. cracking, excessive floating track settlement, disrupted surface, closed-up drains) and drainage conditions (e.g. blocked drains, absence of water in previously flowing drains, springs, etc).

10. INSTRUMENTATION

10.1 Movement Monitoring Posts

To monitor possible peat movements, it is proposed to install sighting posts upslope and downslope of the access track at staggered intervals at locations where the peat depth is greater than 2.0m. Additional monitoring locations will be required at infrastructure locations with deeper peat deposits, as determined by the Designer or Project Geotechnical Engineer. Details of sighting posts are given below.

(1) A line of sighting posts will comprise:

(a) A line of wooden stakes (typically 1 to 1.5m long) placed vertically into the peat to form a straight line.

(b) The sighting line will comprise 6 no. posts at 5m centres that is a line some 25m long.

(c) A string line will be attached to the first and last posts and all intervening posts will be adjusted so they are just touching the string line.

(2) Lines of sighting posts will be placed across the existing slope about 5m away from the area to be worked. The posts will be located along the track at 10m intervals in areas of deep peat (say greater than 2.0m). Where there are relatively steeper slopes or softer ground a sighting line will be placed down the slope, or at any location where monitoring is deemed necessary by the Designer or the Project Geotechnical Engineer.

(3) Each line of sighting posts will be uniquely referenced with each post in the line given a reference. The post reference will be marked on each post (e.g. reference 1-1, 1-2, 1-3, 1-4, 1-5, 1-6 for posts in line 1).

(4) The sighting lines will be monitored at the beginning of each working day, and during the day where considered appropriate (e.g. when working activity is concentrated at a specific location).

(5) Monitoring of the posts will comprise sighting along the line and recording any relative movement of posts from the string line.

(6) Where increased movements are recorded the frequency of monitoring will be increased.

(7) A monitoring record will be kept of the date, time and relative movement of each post, if any. This record will be updated and stored as a spreadsheet.

11. CONTINGENCY MEASURES

11.1 Excessive Movement

Where there is excessive movement or continuing peat movement recorded at a monitoring location or identified at any location within the Site but no apparent signs of distress to the peat (e.g. cracking, surface rippling) then the following will be carried out.

(1) All activities (if any) will cease within the affected area.

(2) Increased monitoring at the location will be carried out. The area will be monitored until such time as movements have ceased.

(3) Re-commencement of activities will only start following a cessation of movement and agreement with all parties (Contractor/Engineer/Designer).

11.2 Onset of Peat Slide

In the unlikely event where there is the onset or actual detachment of peat (e.g. cracking, surface rippling) then the following will be carried out.

(1) On alert of a peat slide incident, all activities (if any) in the area will cease and all available resources will be diverted to assist in the required mitigation procedures.

(2) Action will be taken to prevent a peat slide reaching any watercourse. This will take the form of the construction of check barrages on land. Due to the terrain and the inability to predict locations it may not be possible to implement any on-land prevention measures, in this case a watercourse check barrage will be implemented.

(3) All relevant authorities will be notified if a peat slide event occurs on the Site.

(4) For localised peat slides that do not represent a risk to a watercourse and have essentially come to rest the area will be stabilised initially by rock infill, if required. The failed area and surrounding area will then be assessed by the engineering staff and stabilisation procedures implemented. The area will be monitored, as appropriate, until such time as movements have ceased.

11.3 Check Barrages

Whilst it is not anticipated based on the analysis undertaken that a peat slide will occur on the Site, as a contingency a check barrage procedure is included below.

The check barrage procedure deals with preventing a peat slide from moving downstream within a watercourse.

The most effective method of preventing excessive peat slide debris from travelling downstream in a watercourse is the use of a check barrage. A check barrage comprises the placement of rock fill across a watercourse. The check barrage is a highly permeable construction that will allow the passage of water but will prevent peat debris from passing through. Rock fill will comprise well-graded coarse rock pieces from about 300mm up to typically 1000mm.

The rock fill for the check barrage will be sourced from local quarries.

The size of the barrage will vary depending on the scale of the peat debris to be contained and the geometry of the watercourse at the barrage location. In general, due to the low speed of a peat slide there is generally little impact force and most of the lateral load is due to fluid pressure on the upslope face of the barrage.

The check barrage will fill the entire channel width of the watercourse up to a height of 3 to 4m with a crest width of typically 2m and side slopes of about 45 degrees depending on the geometry of the barrage location.

The check barrage procedure is as follows:

(1) Access to the check barrage location will be along the existing access tracks on the Site and/or along public roads, where possible. When it is necessary to form the barrage then rock fill will be placed across the watercourse to effectively block the passage of peat debris.

(2) Operatives employed to carry out the construction of the check barrage will be inducted by means of a briefing by on-site supervisors as to the proposed location of the check barrage.

(3) The check barrage provides containment for peat debris in the highly unlikely event of a major peat slide. Further remedial measures, should they be required, will be assessed by the Contractor and the Project Geotechnical Engineer, and carried out as soon as physically possible when the location and extent of the failure is established.

(4) Where a barrage was constructed as a precaution and no peat debris reached the watercourse then the barrage will be removed as soon as any measures to prevent further peat sliding is agreed with all parties (Contractor/Engineer/Designer).

12. REFERENCES

Munro, R, 2004. Dealing with bearing capacity problems on low volume roads constructed on peat. Roadex II Northern Periphery.

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Scottish Natural Heritage, 2015. Constructed Tracks in the Scottish Uplands.

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Scottish Government, Scottish Natural Heritage, SEPA, 2017. Peatland Survey. Guidance on Developments on Peatland.

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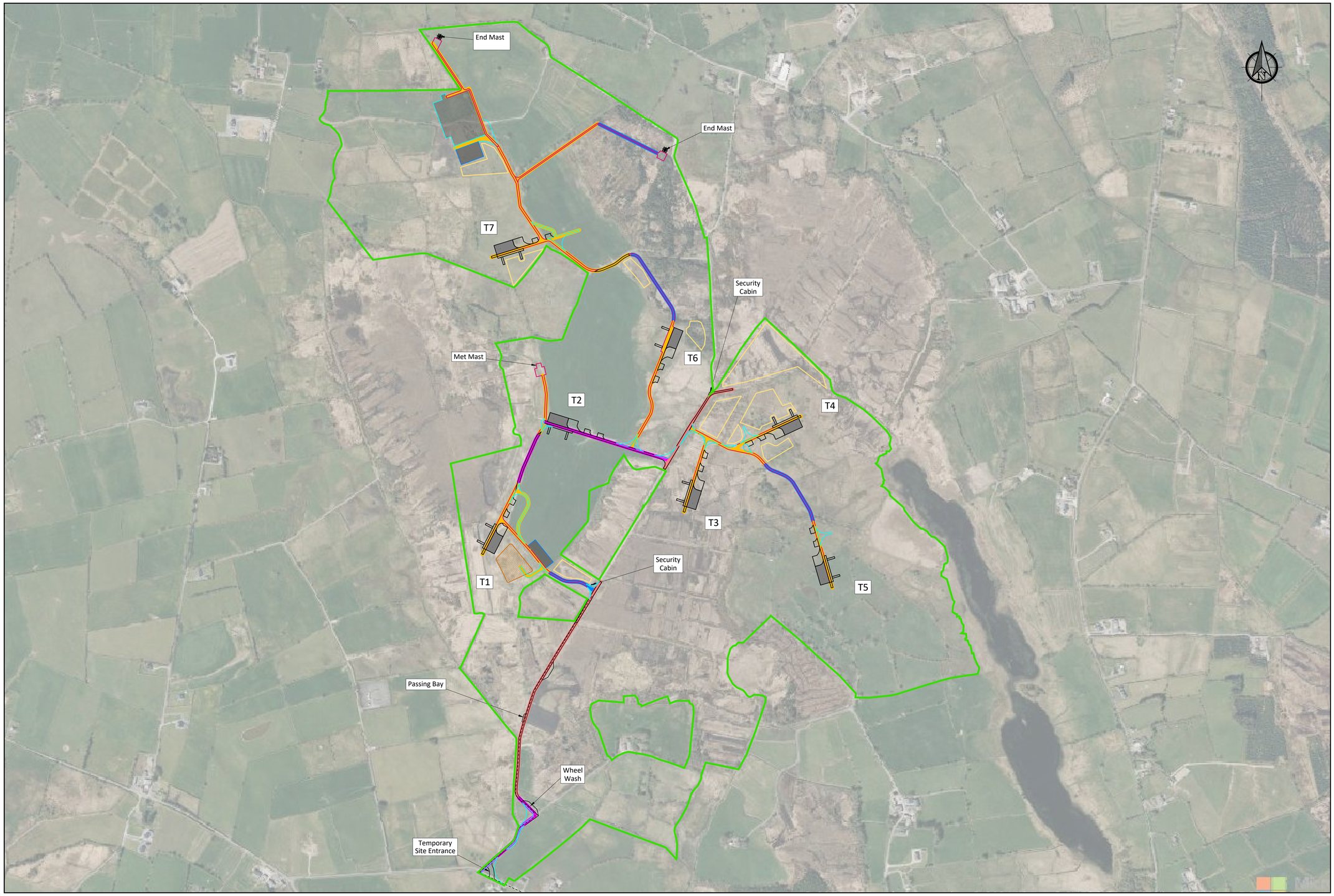
DESIGNING AND DELIVERING
A SUSTAINABLE FUTURE

DRAWINGS



Legend:

- EIAR Study Area
- Turbine / Hardstand
- Turbine / Hardstand Temporary Areas
- Upgrade to Existing Track
- New Track
- Temporary Construction Track
- Upgrade to Public Road
- Proposed Construction Compound
- Proposed Substation
- Proposed Borrow Pit
- Peat and Spoil Management Areas
- Turbine Delivery Route

Track Type Legend:

Type A -
Upgrade of Existing
Excavated Access Track

Type B -
Upgrade of Existing
Floated Access Track

Type C -
New Excavate &
Replace Access Track

Type D -
New Floated Access Track

0m 50m 100m 150m 200m 250m 300m 350m 400m 450m 500m

Scale 1:5000

PLAN

Scale 1:5000

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Rev.	Description	App By	Date
A	FOR INFORMATION	IH	06.03.24
B	FOR INFORMATION	BDH	01.07.25
C	FOR INFORMATION	BDH	05.12.25
D	FOR INFORMATION	BDH	17.04.26
E	FOR INFORMATION	BDH	27.04.26

PROJECT
CUNLAGHFADDA GREEN ENERGY PROJECT

CLIENT
MKO

SHEET
PLAN DRAWING OF WIND FARM WITH TRACK CONSTRUCTION TYPE

Date 27.04.26
Drawn by POR
Checked by IH
Project number P23-270
Scale (@ A1) 1:5000
Drawing Number **P23-270-0600-0005**
Rev **E**

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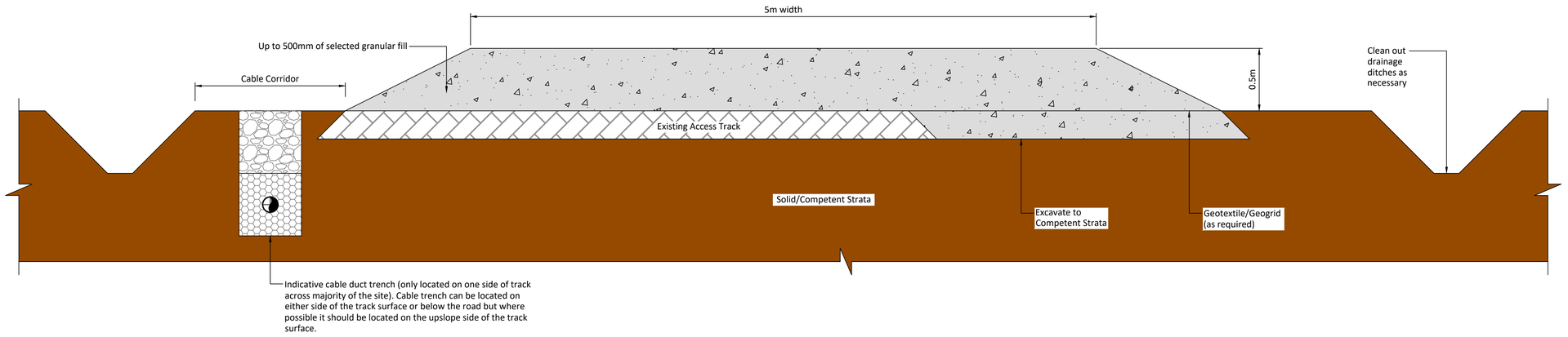
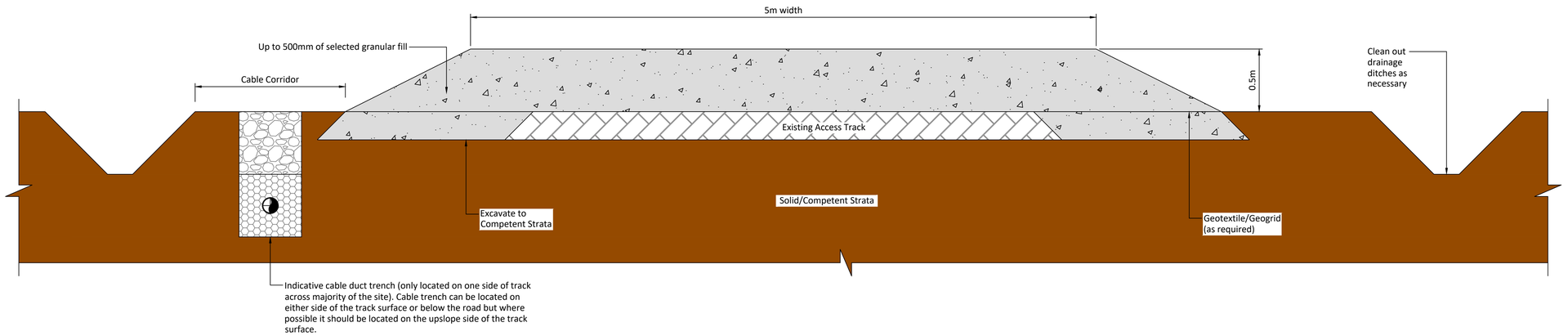
27 April 2026





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Rev.	Description	App By	Date
A	FOR INFORMATION	IH	06.03.24
B	FOR INFORMATION	BDH	05.12.25

PROJECT: CUNLAGHFADDA GREEN ENERGY PROJECT

CLIENT: MKO

SHEET: TYPE A - UPGRADE OF EXISTING FOUNDED ACCESS TRACK

Date: 05.12.25

Project number: P23-270

Scale (@ A1): 1:20

Drawn by: POR

Checked by: IH

Drawing Number: P23-270-0600-0006

Rev: B

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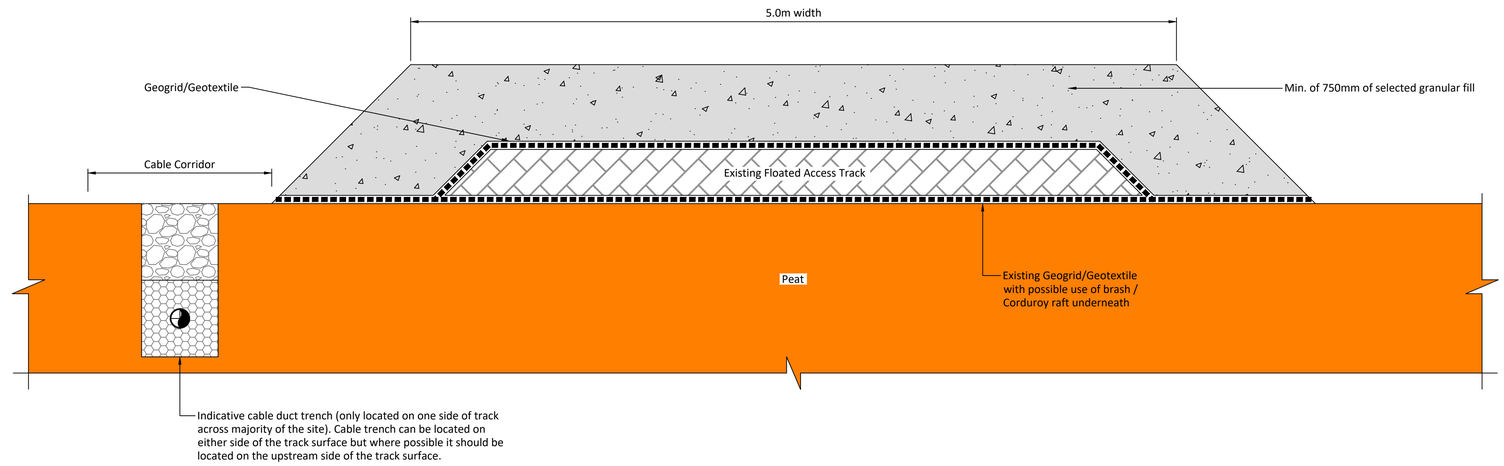
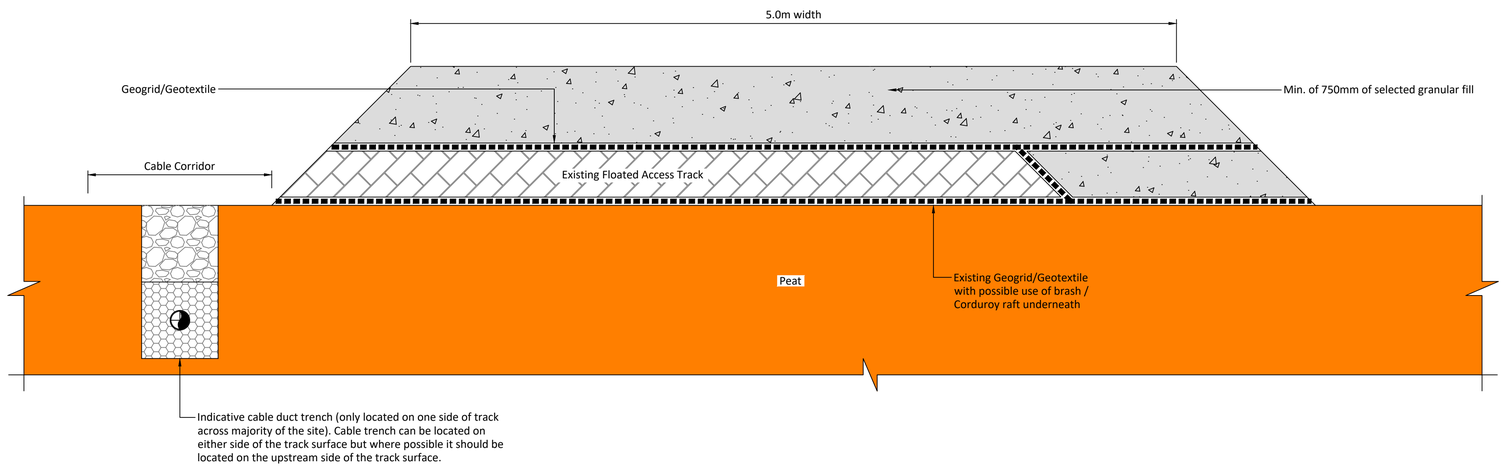
5 December 2025





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Rev.	Description	App By	Date
A	FOR INFORMATION	IH	06.03.24
B	FOR INFORMATION	BDH	05.12.25
C	FOR INFORMATION	BDH	28.04.26

PROJECT: CUNLAGHFADDA GREEN ENERGY PROJECT

CLIENT: MKO

SHEET: TYPE B – UPGRADE OF EXISTING FLOATING ACCESS TRACK

Date: 28.04.26

Drawn by: POR

Checked by: IH

Project number: P23-270

Scale (@ A1): 1:20

Drawing Number: P23-270-0600-0007

Rev: C

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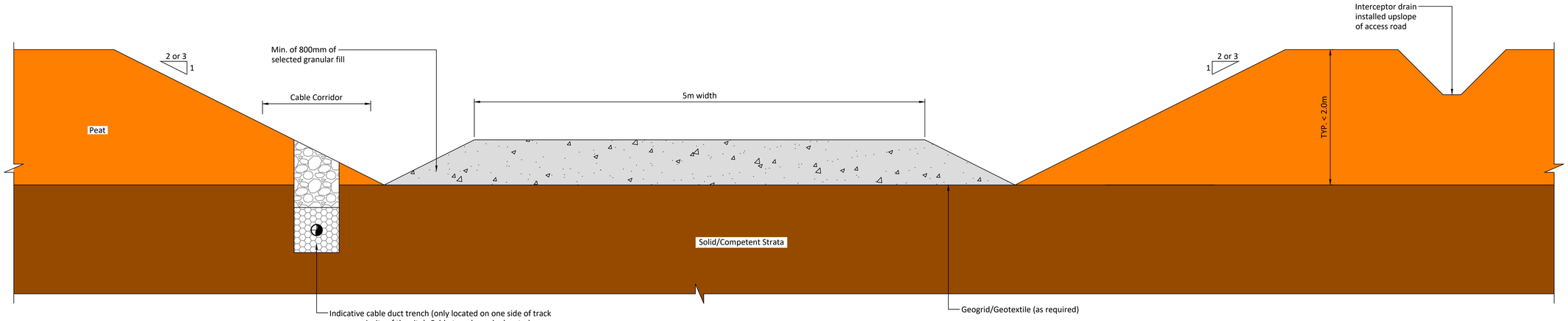
28 April 2026



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Rev.	Description	App By	Date
A	FOR INFORMATION	IH	06.03.24
B	FOR INFORMATION	BDH	05.12.25

PROJECT: CUNLAGHFADDA GREEN ENERGY PROJECT

CLIENT: MKO

SHEET: TYPE C – NEW EXCAVATE AND REPLACE ACCESS TRACK

Date: 05.12.25

Drawn by: POR

Checked by: IH

Project number: P23-270

Scale (@ A1): 1:25

Drawing Number: P23-270-0600-0008

Rev: B

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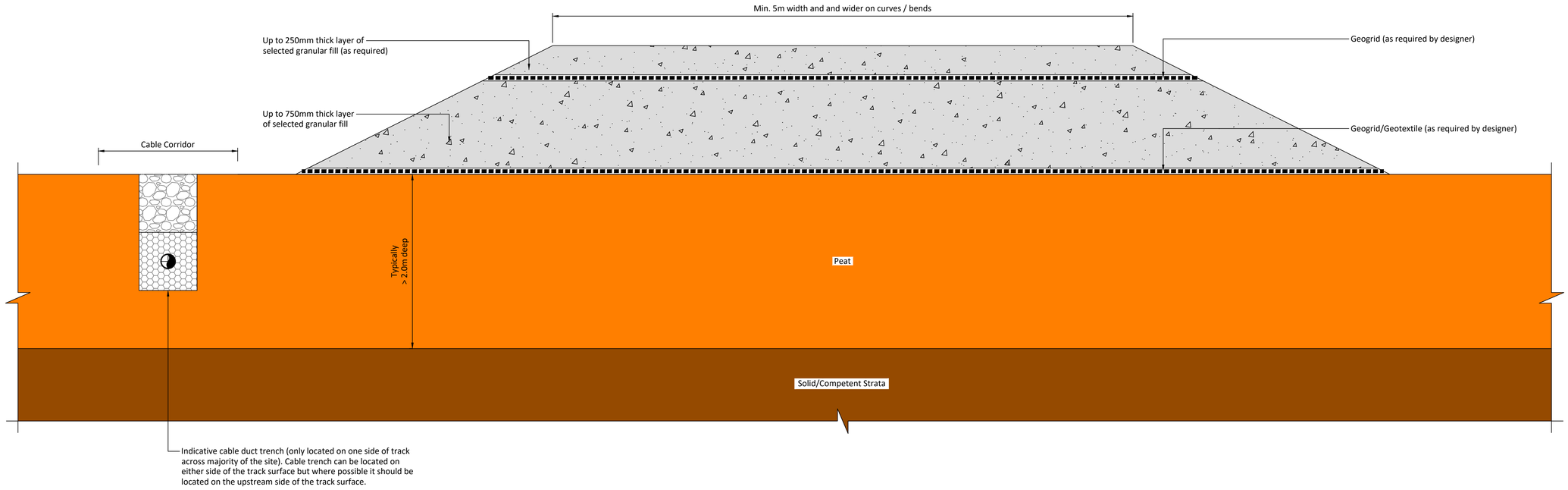
5 December 2025



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Rev.	Description	App By	Date
A	FOR INFORMATION	IH	06.03.24
B	FOR INFORMATION	BDH	05.12.25

PROJECT: CUNLAGHFADDA GREEN ENERGY PROJECT

CLIENT: MKO

SHEET: TYPE D – NEW FLOATING ACCESS TRACK

Date 05.12.25	Project number P23-270	Scale (@ A1) 1:20	
Drawn by POR	Drawing Number P23-270-0600-0009		Rev B
Checked by IH			

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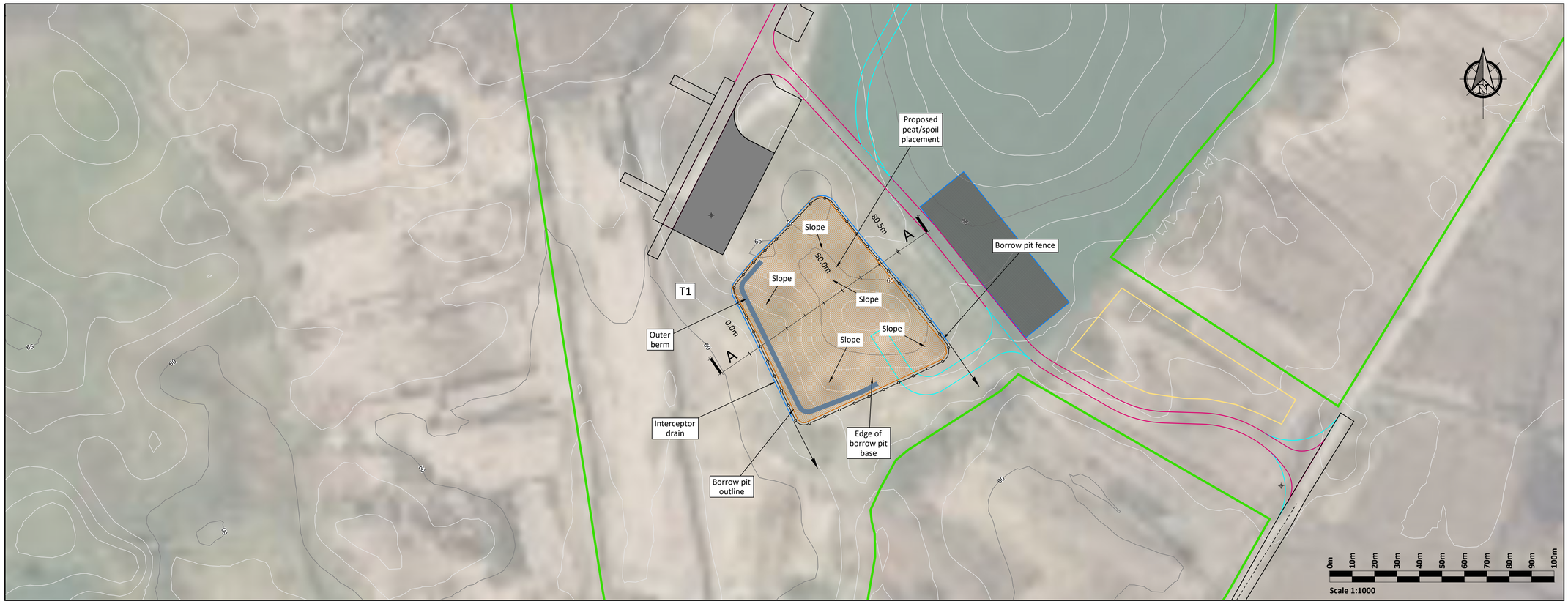
5 December 2025



PLAN

Scale 1:1000

Legend:

- EIAR Study Area
- Turbine / Hardstand
- Turbine / Hardstand Temporary Areas
- Upgrade to Existing Track
- New Track
- Temporary Construction Track
- Upgrade to Public Road
- Proposed Construction Compound
- Proposed Substation
- Proposed Borrow Pit
- Peat and Spoil Management Areas
- Turbine Delivery Route

Borrow Pit Construction Notes:

(1) It is proposed to construct the borrow pit so that the base of the borrow pit is below the level of the adjacent section of access track.

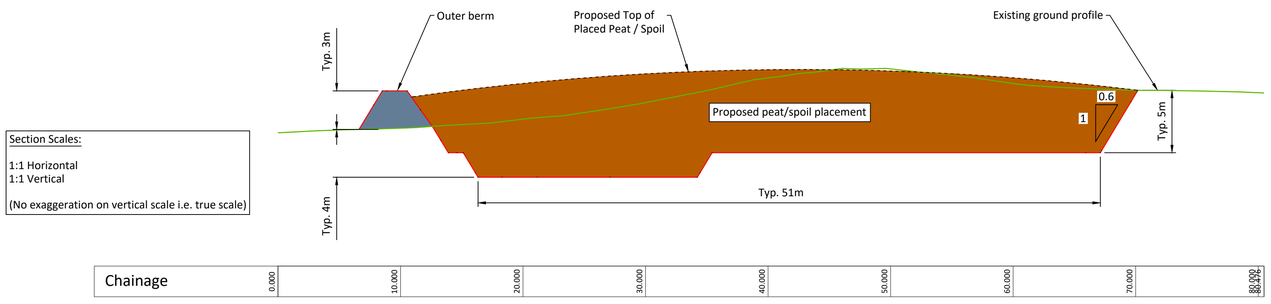
(2) Slopes within the excavated sand and gravel formed around the perimeter of the borrow pit will be formed at 45 degrees.

(3) Infilling of the peat & spoil will commence at the back edge of the borrow pit and progress towards the borrow pit entrance/rock buttress.

(4) The surface of the placed peat & spoil will be shaped to allow efficient run-off of surface water from the placed arising's.

(5) Control of groundwater within the borrow pit may be required and measures will be determined as part of the ground investigation programme.

(6) All the above-mentioned general guidelines and requirements will be confirmed by the designer prior to construction.



SECTION A - A

Scale 1:250

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Rev.	Description	App By	Date
A	FOR INFORMATION	IH	06.03.24
B	FOR INFORMATION	IH	17.04.24
C	FOR INFORMATION	BDH	01.07.25
D	FOR INFORMATION	BDH	05.12.25
E	FOR INFORMATION	BDH	17.04.26

PROJECT: CUNLAGHFADDA GREEN ENERGY PROJECT

CLIENT: MKO

SHEET: BORROW PIT PLAN AND SECTION

Date: 17.04.26

Project number: P23-270

Scale (@ A1): 1:1000

Drawn by: POR

Checked by: IH

Drawing Number: P23-270-0600-0010

Rev: E

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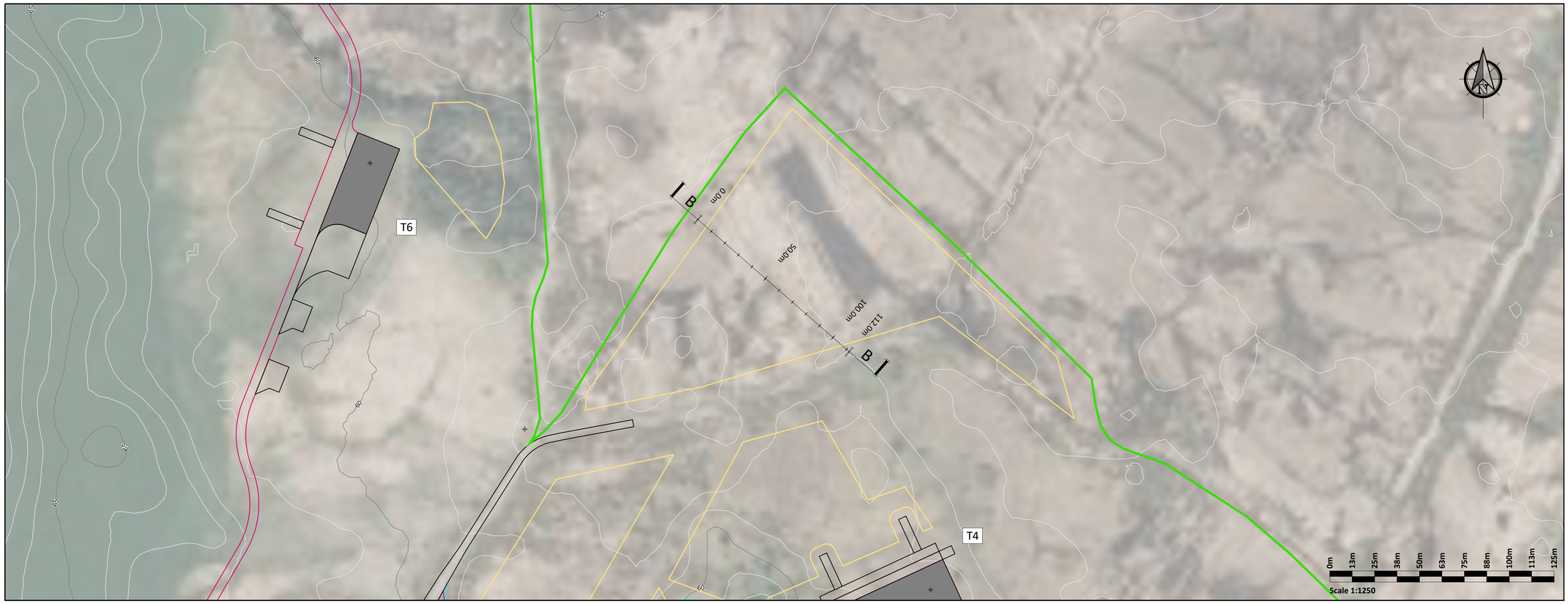
17 April 2026



PLAN

Scale 1:1250

Legend:

- EIAR Study Area
- Turbine / Hardstand
- Turbine / Hardstand Temporary Areas
- Upgrade to Existing Track
- New Track
- Temporary Construction Track
- Upgrade to Public Road
- Proposed Construction Compound
- Proposed Substation
- Proposed Borrow Pit
- Peat and Spoil Management Areas
- Turbine Delivery Route

Construction Notes Peat and Spoil Management Area:

(1) An interceptor drain will also be installed upslope of the peat deposition areas.

(2) A silting pond will be required at the lower side of the peat deposition areas.

(3) It is important that the surface of the stored peat be shaped to allow efficient run-off of water from the stored spoil.

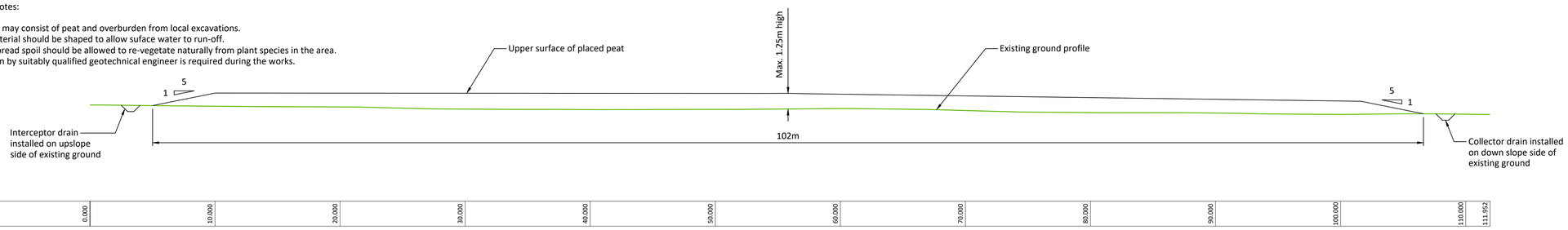
(4) Supervision by a geotechnical engineer or appropriately competent person is recommended for the construction of the peat deposition area.

(5) All the above-mentioned general guidelines and requirements will be implemented during construction.

(6) Further guidelines on the construction of the peat storage area are included within Section 6.5 of the Peat & Spoil Management Plan.

Construction Notes:

1) Spoil heap may consist of peat and overburden from local excavations.
2) Stored material should be shaped to allow suface water to run-off.
3) Placed / spread spoil should be allowed to re-vegetate naturally from plant species in the area.
4) Supervision by suitably qualified geotechnical engineer is required during the works.



SECTION B - B

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Rev.	Description	App By	Date
A	FOR INFORMATION	BDH	08.07.25
B	FOR INFORMATION	BDH	05.12.25
C	FOR INFORMATION	BDH	17.04.26

PROJECT	CUNLAGHFADDA GREEN ENERGY PROJECT
CLIENT	MKO
SHEET	PEAT PLACEMENT ALONGSIDE ACCESS ROADS
Date	17.04.26
Project number	P23-270
Scale (@ A1)	1:1250
Drawn by	POR
Checked by	IH
Drawing Number	P23-270-0600-0011
Rev	C

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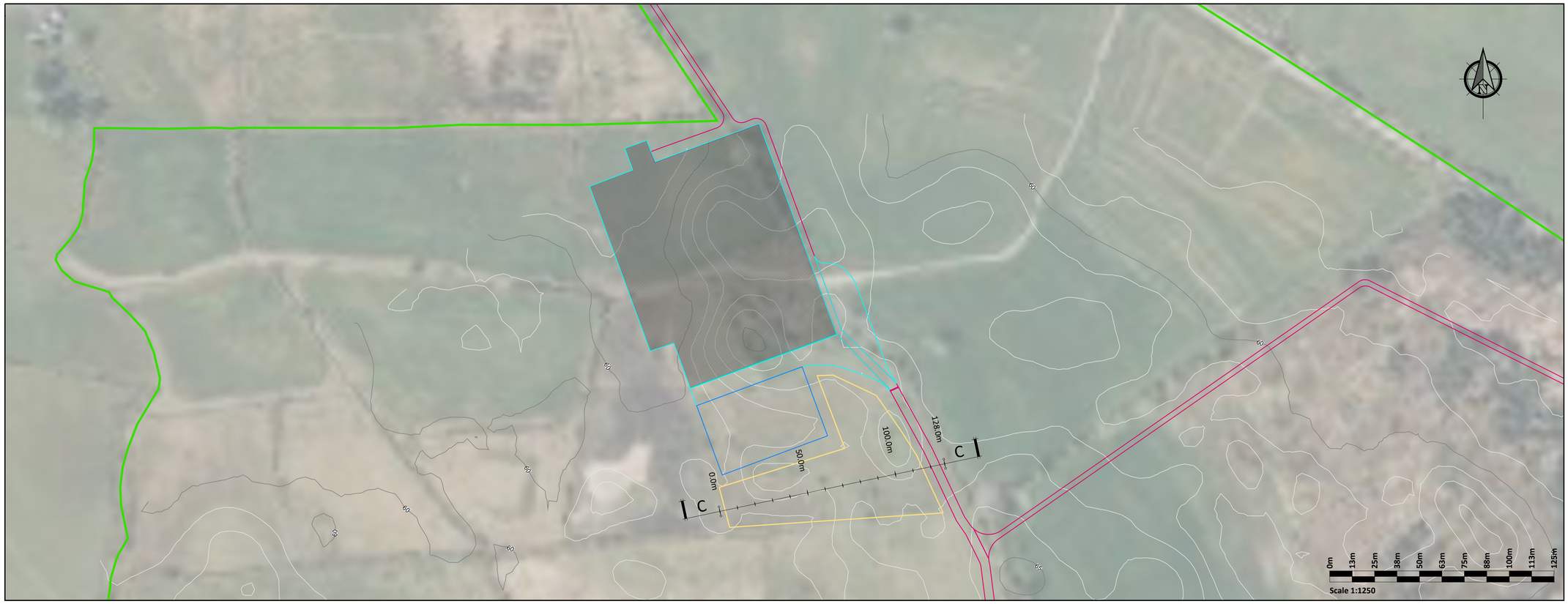
17 April 2026



PLAN

Scale 1:1250

Legend:

- EIAR Study Area
- Turbine / Hardstand
- Turbine / Hardstand Temporary Areas
- Upgrade to Existing Track
- New Track
- Temporary Construction Track
- Upgrade to Public Road
- Proposed Construction Compound
- Proposed Substation
- Proposed Borrow Pit
- Peat and Spoil Management Areas
- Turbine Delivery Route

Construction Notes Peat and Spoil Management Area:

(1) An interceptor drain will also be installed upslope of the peat deposition areas.

(2) A silting pond will be required at the lower side of the peat deposition areas.

(3) It is important that the surface of the stored peat be shaped to allow efficient run-off of water from the stored spoil.

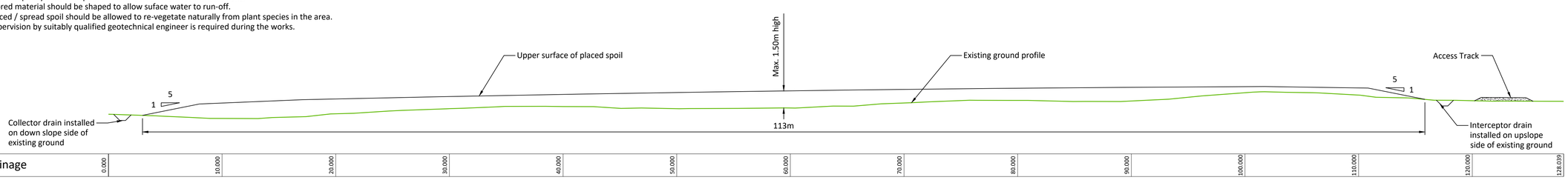
(4) Supervision by a geotechnical engineer or appropriately competent person is recommended for the construction of the peat deposition area.

(5) All the above-mentioned general guidelines and requirements will be implemented during construction.

(6) Further guidelines on the construction of the peat storage area are included within Section 6.5 of the Peat & Spoil Management Plan.

Construction Notes:

1) Spoil heap may consist of peat and overburden from local excavations.
2) Stored material should be shaped to allow suface water to run-off.
3) Placed / spread spoil should be allowed to re-vegetate naturally from plant species in the area.
4) Supervision by suitably qualified geotechnical engineer is required during the works.



SECTION C - C

Scale 1:200

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Rev.	Description	App By	Date
A	FOR INFORMATION	BDH	08.07.25
B	FOR INFORMATION	BDH	05.12.25
C	FOR INFORMATION	BDH	17.04.26

PROJECT: CUNLAGHFADDA GREEN ENERGY PROJECT	CLIENT: MKO		
SHEET: SPOIL PLACEMENT ALONGSIDE ACCESS ROADS	Date: 17.04.26	Project number: P23-270	Scale (@ A1): 1:1250
	Drawn by: POR	Drawing Number: P23-270-0600-0012	Rev: C
	Checked by: IH		

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17 April 2026

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